
From: Vasser, Shmuel
Sent: Friday, February 21, 2014 11:22 AM
To: Fail, Garrett
Cc: Brilliant, Allan
Subject: Lehman-Stonehill

Dear Garrett, section 8.4 of the Plan includes language that you deleted when citing the section in your motion. The full portion of paragraph 8.4(b) reads: "*the amount determined, to the extent permitted by the Bankruptcy Code and Bankruptcy Rules*, by the Bankruptcy Court for purposes of fixing the amount to be retained for such Disputed Claim" (emphasis added). The emphasized language has been omitted by you from the motion.

We are not aware of any Bankruptcy Code section or Bankruptcy Rule that permits the relief you are seeking. We hereby request that you provide us by the end of business today the Code section, Rule and any case law you intend to rely on in support of your motion. As you are aware, we should be able to fully respond to your motion, rather than discover it's legal basis and supporting authorities in your reply, to which we are not allowed to respond.

Your failure to respond as requested herein, will result in us seeking to strike any basis of your motion to be contained in a reply that is not asserted in your motion or otherwise provided to us as requested herein. Best,

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